



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 11/21/2000Time Start 2:30 pm

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name CRC Industries, Inc. I.D. Number PAID069880029Site Address 885 Louis Dr.County BUCKS Municipality Warminster Twp Zip 18912Name of Inspector Michelle MilburnName & Title of Responsible Official Adam Selisker, Env. Health & Safety mgr.Person Interviewed Adam Selisker Telephone (215) 442-6223Mailing Address (if different from above) SameAmount of Hazardous Waste Generated per Month: 720,000 Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Haz. Mat Environmental Group License Number _____Transporter Name SJ Transportation License Number _____Transporter Name Tri-State Motor Transit License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001 / D027	Waste Flammable Liquids	RINECO Benton, AR ARD981057870
D001 / D035 / D039	Waste Flammable Solid	
F003 / F005	Perchloroethylene, Toluene	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CRC Industries, Inc. ID Number PAD069880029 Date 11/21/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name CRC Industries ID Number PAD069880029 Date 11/21/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11/21/2000 Identification Number PAID069880029Company/Facility/Site Name CRC Industries

A follow-up large quantity hazardous waste generator inspection was conducted by Michelle Milburn, with PADEP. Present from the facility was Adam Selisker.

The facility has created a new Source Reduction Strategy (Form 25R) for their hazardous wastes. This form will be supplemented with monthly tracking reports showing hazardous waste reduction from month to month.

The violation of 25 PA Code Section 262a.100 has been corrected.

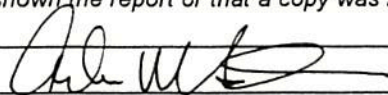
No new violations are being cited.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Date 11/21/2000

Inspector (signature)

Michelle Milburn



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 10/31/2000Time Start 1:00 pm

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name CRC Industries, Inc. I.D. Number PAD069880029Site Address 885 Louis Dr.County Bucks Municipality Warminster Twp Zip 18972Name of Inspector Michelle MilburnName & Title of Responsible Official Adam Selisker, Env Health & Safety MgrPerson Interviewed Adam Selisker Telephone (215) 442-6223Mailing Address (if different from above) sameAmount of Hazardous Waste Generated per Month: >20,000 Pounds _____ Kgs _____**1. Site Characterization:**STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:Transporter Name Haz Mat Environmental Group License Number _____Transporter Name SJ Transportation License Number _____Transporter Name Tri-State Motor Transit License Number _____**4. Types of hazardous waste generated and destination facility (location & type).**

Waste Code	Waste Description	Destination Facility
D001/0027	Waste Flammable Liquids (Aliphatic & Aromatic Hydrocarbons)	RINECO Benton, AR ARD981057870
D001/0035/D039	Waste Flammable Solid	
F003/F005	Perchloroethylene, Toluene	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CRC Industries ID Number PAD009880029 Date 10/31/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LIN NO
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H00
X				Identification Number	262a.10	262.12	H00
X				Authorized transporters only	262a.10	262.12(c)	H00
X				Subsequent notification requirements met	262a.12(b)		H00
X				Proper manifest used	262a.10	262.21	H00
X				Manifests filled out correctly and completely	262a.20		H00
X				Manifests signed and routed properly	262a.23(a)	262.23	H00
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H00
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H00
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H01
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H01
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H01
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H01
X				Specified records retained for three years	262a.10	262.40(c)	H01
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H01
X				Exception reporting procedures followed	262a.42	262.42	H01
X				Spill reporting procedures followed	262a.10	262.34(d)	H01
X				PPC plan developed and implemented	262a.10	262.34(a)	H01
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H01
		X		Source reduction strategy prepared and available (LQG only)	262a.100		H02
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H02

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CRC Industries ID Number PAD009880029 Date 10/31/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4				REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 10/31/2000 Identification Number PAD069880029Company/Facility/Site Name CRC Industries

A large quantity hazardous waste generator inspection of CRC Industries was conducted by Michelle Milburn, Solid Waste Specialist, with the PADEP. Present from CRC Industries was Adam Selisker, Dir. Technical Services.

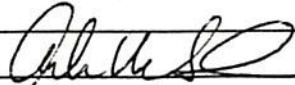
A facility tour was conducted. Some satellite accumulation containers are used. These containers were labeled with the words Hazardous Waste. The main storage area is outside. Drums are stored on pallets and are covered by tarps. All drums were closed; no spills or leaks were observed. All drums contained a hazardous waste label, though some were lacking a date and/or description of contents. This information was added during the inspection. The storage area is inspected on a daily basis, and the inspections are logged in a book.

Manifests for the past 8 months were reviewed. All manifests were fully and properly completed. A copy of the 1999 Biennial Report was available for inspection. The PPC Plan was reviewed and appeared to be up-to-date and complete. The plan was last revised in 1997. The facility provides hazard communication training to employees. Sign-in sheets from the last training

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Date 10/31/2000Inspector (signature) Michelle Milburn

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 10/31/2000 Identification Number PAD069880029Company/Facility/Site Name CRC Industries

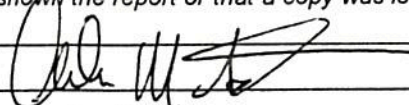
Class were available. While the facility has put several waste minimization practices in place, the facility does not have a formal Source Reduction Strategy. This is contrary to 25 PA Code Section 262a.100. Mr. Selisker stated that he would create a SRS for the facility.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Date 10/31/2000

Inspector (signature)

Michelle Miller



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART A

Date of Inspection 01/28/98 Time start _____ Time finish _____
Name of Inspector DIRK ROBINSON
Company, installation name CRC Industries Inc.
Location 885 Louis Dr. Warminster PA. 18974
County Bucks Municipality WARMINSTER
Identification number PAD 69880029
Name of responsible official ADAM M. SELISKER
Title ENVIRONMENTAL HEALTH & Safety MANAGER
Mailing Address SAME
Area code and telephone number (215) 442-6223
Name of person interviewed ADAM SELISKER
Title SAME
Mailing address (if different from above) SAME
Area code and telephone number SAME

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments ☐ chemical ☐ physical ☐ biological
b. ☒ Storage - ☐ containers ☒ tanks ☐ surface impoundments ☐ waste piles
c. ☐ Disposal - ☐ land treatment ☐ landfill ☐ incineration ☐ thermal treatment
d. ☐ Use ☐ reuse ☐ recycle ☐ reclaim

2. Does the facility generate hazardous waste? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

F001
D001

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

CRC has gone through clean closure of their "TSD" storage tanks. The facility is now operating as a LQG.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 01/28/98
Time Start _____
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name CRC Industries Inc. I.D. Number PD069880629
Site Address 885 Louis Dr. Warminster PA. 18974
County Bucks Municipality Warminster ZIP 18974
Name of Inspector Dirk Robinson
Name & Title of Responsible Official Adam M. Selisker
Person Interviewed Same Telephone (215) 442-6223
Mailing Address (if different from above) Same
Amount of Hazardous Waste Generated per Month: _____ Pounds > 1,000 Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name _____ License Number _____
Transporter Name _____ License Number _____
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>F001</u>		
<u>P002</u>		

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name CFC Industries Inc. ID Number PA069880029 Date 01/28/98
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				CONTAINERS (Subchapter I)		
X				Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
				Containers of hazardous waste in good condition	265.171	H026
				Containers and stored waste compatible	265.172	H027
				Containers kept closed except during addition or removal of wastes	265.173	H028
				Containers managed to prevent leaks	265.173(b)	H029
				Containers labeled to accurately identify contents	265.173(c)	H030
				Container storage areas inspected at least weekly	265.174	H031
				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
				Proper containment and collection systems in place	265.178(a)-(d)	H033
				All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				TANKS (Subchapter J)		
X				Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
				Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
				Secondary containment provided for tanks (systems) as required	265.193	H041
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
				Tanks labeled to accurately identify contents	265.194(d)	H043
				Required inspections completed and documented in operating log	265.195	H044
				Release reported to Department within 24 hours, unless exempted	265.196	H045
				Special requirements for ignitable and reactive wastes followed	265.198	H046
X				SQ Generator complies with 265.201	262.34(e)(3)	H047

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 01/28/98 Identification Number BAD 969380829
Company/Facility/Site Name CRC Industries INC.An inspection of the above referenced facility revealed
no violationThe 3,000 gallon spill of Methanol has been cleaned up
and contaminated soil shipped off site for proper disposal

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) mailed to facilityDate 01/30/98Inspector (signature) Dick K. RobinsonDate 01/30/98

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 11/06/97 Time start _____ Time finish _____
Name of Inspector Dirk Robinson
Company, installation name CRC Industries, Inc.
Location 885 Louis Drive, Box 5000, Warminster PA 18977
County Bucks Municipality Warminster
Identification number PA 069880029
Name of responsible official Adam M. Selisker
Title ENVIRONMENTAL HEALTH & SAFETY OFFICER MANAGER
Mailing Address SAME
Area code and telephone number (215) 674 4300
Name of person interviewed SAME
Title SAME
Mailing address (if different from above) SAME
Area code and telephone number SAME

1. Current waste handling method:

- | | | | | |
|---|-------------------------------------|-----------------------------------|--|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 71000 kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>FOO1</u>		
<u>FOO2</u>		

4. Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

11/06/97

Identification Number

PA1069880029

Company/Facility/Site Name

CRC Industries, Inc.

CRC Industries has responded to the Department's request on how the facility will prevent any further spills in the future. Attached is a copy of the facility's response.

The oversight for the clean up of this spill is now being conducted by Sarah Tubbs from the Department's Storage Tank program.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Date

Inspector (signature)

Duke K Robinson

Date

11/07/97



CRC Industries, Inc.

NOV 05 1997
AMERICAS GROUP

November 4, 1997

Dirk Robinson
PA DEP
Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428

RE: Methanol Spill: April 30, 1997

Dear Mr. Robinson:

Thank you again for your assistance with the methanol spill that occurred at our facility.

The preventative action procedure put in place is as follows:

When the containment area is being drained, personnel will monitor the 3" valve at all times that it is in the open position. Additionally, no loading or unloading will take place when the area is being drained. At no time will the valve be in the open position and unmonitored.

This procedure was implemented immediately after the spill.

If you have any questions, please feel free to contact me at (215) 442-6223.

Sincerely,

Adam M. Selisker
Environmental Health & Safety Manager

AMS:jjk



RCRIS UNIVERSE MAINTENANCE FORM

EPA ID

P	A	D	O	G	9	8	8	0	0	2	9
---	---	---	---	---	---	---	---	---	---	---	---

Facility Name: CRC Industries, Inc.

Source: Notification ☐
 Part A ☐
 State Inspection ☒
 EPA Inspection ☐

Notification Date 4/30/97

Waste Activity	Indicator Code	RCRA Reg Status	RCRA Reg Description
Generator	<u>1</u>	<u>R</u>	<u> </u>
Transporter	<u> </u>	<u> </u>	<u> </u>
Mode of Transportation:	Air <u> </u> Water <u> </u>	Rail <u> </u> Other <u> </u>	Highway <u> </u>

<input checked="" type="checkbox"/>	IR Inspection report	
<input type="checkbox"/>	Revised Notification from the state	
<input type="checkbox"/>	Revised Notification from the facility	
<input type="checkbox"/>	Other	
	Date to Data Entry	<u>8-5</u>
	Batch Number	<u>295</u>
	Date QAd	<u> </u>

1457

Old Universe: TSD
 PA 1

1500

1500

1500

1500

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

EPA

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART A

Date of Inspection 04/30/97 Time start _____ Time finish _____
Name of Inspector DIRK K. ROBINSON
Company, installation name CRC Industries, Inc.
Location 885 LOUIS DRIVE WARMINSTER PA 18911
County Buck Municipality WARMINSTER
Identification number PAD 069880029
Name of responsible official ADAM M. SELISKER
Title ENVIRONMENTAL HEALTH & SAFETY MANAGER
Mailing Address SAME
Area code and telephone number (215) 442-6223
Name of person interviewed ADAM SELISKER
Title SEE ABOVE
Mailing address (if different from above) SAME
Area code and telephone number SAME

1. Site characterization: NONE of the following.
- | | | | | |
|---|---|-----------------------------------|---|--|
| a. <input type="checkbox"/> Treatment - | <input type="checkbox"/> surface impoundments | <input type="checkbox"/> chemical | <input type="checkbox"/> physical | <input type="checkbox"/> biological |
| b. <input type="checkbox"/> Storage - | <input type="checkbox"/> containers | <input type="checkbox"/> tanks | <input type="checkbox"/> surface impoundments | <input type="checkbox"/> waste piles |
| c. <input type="checkbox"/> Disposal - | <input type="checkbox"/> land treatment | <input type="checkbox"/> landfill | <input type="checkbox"/> incineration | <input type="checkbox"/> thermal treatment |
| d. <input type="checkbox"/> Use | <input type="checkbox"/> reuse | <input type="checkbox"/> recycle | <input type="checkbox"/> reclaim | |
2. Does the facility generate hazardous waste? ☒ Yes ☐ No
3. Types of hazardous waste produced by Hazardous Waste Number:
F002
D001
4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

This facility is now a large quantity generator only. The hazardous waste storage tank has ~~been~~ gone through complete closure and has been removed from the site.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - STORAGE (TANKS) - PART B

Site Name CRC Industries ID Number PAD 069880629 Date 04/30/97

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
				Tanks labeled to accurately identify contents	265.194(d)	H347
				Proper secondary containment provided	265.193	H348
				Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	265.194(a)	H349
				Tanks managed to prevent spills/overflows	265.194(b)	H350
				Overfill prevention controls/devices provided	265.194(b)(2)	H351
				Uncovered tanks operated to ensure sufficient freeboard	265.194(b)(3)	H352
				Monitoring equipment data inspected once each operating day	265.195(a)	H353
				Overfill/spill control equipment inspected daily	265.195(a)(1)	H354
				Construction materials of tanks inspected daily	265.195(a)(4)	H355
				Externally accessible portion of tank system inspected daily	265.195(a)(4)	H356
				All hazardous waste removed from tanks and related appurtenances at closure	265.197	H357
				Proper placement of ignitable or reactive waste	265.198(a)	H358
				Tanks in which ignitable or reactive waste is treated or stored meets NFPA buffer zone requirements	265.198(b)	H359
				Precautions taken for handling ignitable, reactive or incompatible waste or materials	265.199	H360

TANK HAS GONE THROUGH
COMPLETE CLOSURE AND HAS
BEEN REMOVED FROM SITE

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 04/30/97 Time start _____ Time finish _____
Name of Inspector DIRK ROBINSON
Company, installation name CRC Industries, Inc.
Location 885 Louis Drive Warminster PA. 18974
County BUCKS Municipality WARMINSTER
Identification number PAD06988 07 29
Name of responsible official Adam M. SELISKER
Title ENVIRONMENTAL Health & SAFETY MANAGER
Mailing Address SAME
Area code and telephone number (215) 442-6223
Name of person interviewed Adam SELISKER
Title SAME
Mailing address (if different from above) SAME
Area code and telephone number SAME

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 7,000 kg/mo.
b. _____ kg/yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>E001</u>		
<u>B002</u>		

4. Source Reduction: ☒ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B**

Site Name CRC Industries ID Number PAID 69880029 Date 04/30/97

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
X				Shipping containers marked and labeled according to U.S. DOT	262.30(2)	H010
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
		X		Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
X				h). Proper containment and collection system(s)	265.178	H023
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
		X		On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				BE-EX Reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
X				Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	X			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection: 04/30/97

Company/Facility/Site Name: CRC Industries, Inc.

I.D. # : PAD 069 880 029

An inspection was conducted by the Department, in accompaniment with Adam M. Selisker, Environmental Safety and Health Manager for CRC Industries, Inc. The inspection was initiated as a result of a 3,000 gallon spill of Methyl Alcohol (Methanol) from the facility's raw material tank storage area. The inspection of the facility and the inspection report only refers to the facility's handling of thier hazardous wastein accordance to the Department's rules and regulations. The spill incedent and the clean up of the spill will be addressed in a separate report. An inspection of the above referenced facility revealed the following:

No violations were revealed during the Department's inspection of the facility.

This facility is no longer operating a "TSD" (Tank Storage). The hazardous waste storage tank has gone through complete closure and has been removed from the facility and properly disposed.

The facility is presently and only conducting its hazardous waste activities as a large quantity generator (LQG).

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Mailed to facility

Date

05/20/97

Inspector (signature)

Dick K. Robinson

Date

05/20/97



Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
May 19, 1997

Southeast Regional Office

610-832-6212
Fax 610-832-6143

Mr. Adam M. Selisker
Environmental Health and Safety Manager
CRC Industries, Inc.
885 Louis Drive
Warminster, PA 18974

Re: Methyl Alcohol (Methanol)
3,000 gallon spill at 10:50 AM,
April 30, 1997
PAD 069 880 029
Bucks County
Warminster Township

NOTICE OF VIOLATION

Dear Mr. Selisker:

The Department conducted an inspection of CRC Industries, Inc. on April 30, 1997, as a result of your facility reporting a 3,000 gallon spill of Methyl Alcohol (Methanol). Requirements for hazardous waste facilities are contained in the Solid Waste Management Act of the Commonwealth of Pennsylvania, Act of July 7, 1980 P.L. 380, as amended, 35 P.S. § 6018.101 et seq. ("SWMA"); The Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S. § 691.1 et seq.; Section 1917-A of the Administrative Code of 1929, P.L. 177 as amended, 71.A § 510-17; and Chapters 260 through 270 of the rules and regulations of the Department.

It was revealed during the Department's inspection on April 30, 1997 that CRC Industries, Inc. failed to close the rain water release valve of the raw material tank farm's secondary containment area. Violation of applicable sections of these regulations revealed during the Department's inspection on April 30, 1997 are as follows:

§ 6018.601 - Any violation of any provision of this act, any rule or regulation of the department, any order of the department, or any term or condition of any permit shall constitute a public nuisance. Any person or municipality committing such a violation shall be liable for the costs of abatement of any pollution and any public nuisance caused by such violation.

§ 6018.610(1) - It shall be unlawful for any person or municipality to dump or deposit, or permit the dumping or depositing, of any solid waste onto the surface of the ground or underground or into the waters of the Commonwealth, by any means, unless a permit for the dumping of such solid wastes has been obtained from the department; provided, the Environmental Quality Board may by regulation exempt certain activities associated with normal farming operations as defined by this act from such permit requirements.



May 19, 1997

§ 691.307 - No person or municipality shall discharge or permit the discharge of industrial wastes in any manner, directly or indirectly, into any of the waters of the Commonwealth unless such discharge is authorized by the rules and regulations of the department or such person or municipality has first obtained a permit from the department.

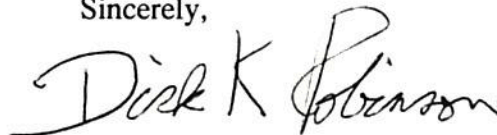
You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Protection.

If you have any questions concerning this matter, please feel free to contact me at 610- 832-6168.

Sincerely,

A handwritten signature in black ink that reads "Dirk K. Robinson". The signature is written in a cursive, flowing style.

Dirk K. Robinson
Solid Waste Specialist
Waste Management Program

cc: Compliance
EPA
Field File
Regional File
Bucks County Health Dept.
Warminster Township
Re 30 (DJ)139-12

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

TSD and Generator Insp.

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART A

Date of Inspection 7/25/1994 Time start 1:00pm Time finish 4:00pm
Name of Inspector Dennis HARNEY
Company, installation name CRC Chemicals Inc
Location 885 Louis DR.
County Bucks Municipality Warminster
Identification number PAD 06 9880029
Name of responsible official Richard Miller
Title V.P. Research and Development
Mailing Address 885 Louis DR. Warminster PA 18974
Area code and telephone number (215) 674-4300
Name of person interviewed Adam Selisker
Title Environmental and Safety Coordinator
Mailing address (if different from above) 885 Louis DR. Warminster, PA 18974
Area code and telephone number (215) 442-6223

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments ☐ chemical ☐ physical ☐ biological
b. ☒ Storage - ☐ containers ☒ tanks ☐ surface impoundments ☐ waste piles
c. ☐ Disposal - ☐ land treatment ☐ landfill ☐ incineration ☐ thermal treatment
d. ☐ Use ☐ reuse ☐ recycle ☐ reclaim

2. Does the facility generate hazardous waste? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

F002

D001

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

No longer operating as a storage facility.
Tank is empty at this time.
Closure in process.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART B

RECEIVED
PA/DC SECTION

SEP 27 1994

Site Name CRC Chemicals Inc ID Number PAD 069880029 Date 7/25/1994

EPA REGION III

Hazardous Waste Inspection Report
TSD Facilities - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
X				Part A permit application submitted	265.1(b) 265.431(a)	H200
X				Identification number	265.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DER to transport hazardous waste	265.11(a)	H202
	X			Waste streams not covered by permit approved by DER before acceptance	265.13(a)	H203
	X			Chemical and physical analysis repeated as required	265.13(a)(1-3)	H204
	X			All waste shipments inspected and analyzed when necessary	265.13(b)	H205
	X			Waste analysis plan on-site	265.13(c)	H206
	X			24 hr. surveillance at active portion	265.14(b)(1)	H207
	X			Artificial barrier around active portion	265.14(b)(2)	H208
	X			Proper signs posted at each entrance, minimum 4 inch lettering	265.14(c)	H209
	X			Facility inspection schedule on-site	265.15(b)(1)	H210
	X			Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	265.15(d)	H211
	X			Immediate remedial action taken where a hazard is imminent or has already occurred	265.15(d)	H212
	X			Approved on the job or classroom personnel training program implemented	265.16	H213
	X			Records retained for each employee at facility of training, job title, and job description	265.16(f);(g)	H214
	X			Ignitable or reactive wastes separated from source of ignition or reaction	265.17(a)	H215
	X			No smoking signs displayed where there are hazards from ignitable or reactive wastes	265.17(a)	H216
	X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	265.17(b)	H217
	X			Facility maintained/operated to minimize possibility of fire, explosion, or discharge of hazardous waste or hazardous constituents	265.31	H218

Hazardous Waste Inspection Report

TSD Facilities - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
	X			Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	265.32(1)	H219
	X			Device for summoning outside emergency assistance available at scene of operations	265.32(2)	H220
	X			Facility equipped with fire control, spill control, and decontamination equipment	265.32(3)	H221
	X			Facility equipped with water at adequate volume and pressure to supply fire control equipment	265.32(4)	H222
	X			Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained	265.33	H223
	X			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	265.35	H224
	X			Contingency plan onsite and implemented	265.51(a)	H225
	X			Contingency plan describes action taken by personnel in the event of an emergency	265.52(a)	H226
	X			Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	265.52(c)	H227
	X			Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	265.52(d)	H228
	X			Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item	265.52(e)	H229
	X			Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	265.52(f)	H230
	X			Emergency coordinator designated and on the premises or on call	265.55	H231
	X			Facility accepting only PA manifests	265.71(a)	H232
	X			Manifest properly completed and routed within time limits	265.71(b)(c)	H233
	X			Manifest discrepancies resolved or reported within time limits	265.72(b)	H234
	X			Written operating record maintained on the premises	265.73(a).	H235
	X			Written operating record contains description and quantity of wastes and method of treatment, storage or disposal	265.73(b)(1)	H236
	X			Written operating record contains location and quantity of each hazardous waste	265.73(b)(2)	H237
	X			Written operating record contains results of waste analyses and treatability tests	265.73(b)(3)	H238
	X			Written operating record contains reports and details of all incidents	265.73(b)(4)	H239
	X			Written operating record contains records and results of all inspections	265.73(b)(5)	H240
	X			Written operating record contains required monitoring, testing, and analytical data	265.73(b)(6)	H241

Hazardous Waste Inspection Report

TSD Facilities - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
X				Written operating record contains closure and post-closure cost estimates	265.73(b)(7)	H242
	X			All records retained on premises and available for inspection	265.74(a)	H243
	X			Quarterly reports submitted to DER	265.75(a)	H244
	X			Emissions, discharges, fires, explosions, and groundwater contamination reported as required	265.77(a)	H245
	X			Groundwater monitoring wells located at approved sites	265.90(b)	H246
	X			Approved groundwater sampling and analysis plan developed and implemented	265.92(a)	H247
	X			Adequate protection for groundwater monitoring wells	265.92(d)	H248
	X			Groundwater quality assessment and abatement outline on the premises	265.93(a)	H249
		X		Closure plan on the premises and up-to-date	265.112(a)	H250
	X			Post-closure plan on the premises and up-to-date	265.118(a)	H251
		X		Annual closure cost estimate on the premises and up-to-date	265.142(a)	H252
	X			Annual post-closure cost estimate on the premises and up-to-date	265.144(a)	H253

RECEIVED
PA/DC SECTION

SEP 27 1994

EPA

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - STORAGE (TANKS) - PART B

Site Name CRC Chemicals Inc ID Number PAD 0698F0029 Date 7/25/1994

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
	X			Tanks labeled to accurately identify contents	265.194(d)	H347
X				Proper secondary containment provided	265.193	H348
	X			Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	265.194(a)	H349
	X			Tanks managed to prevent spills/overflows	265.194(b)	H350
		X		Overfill prevention controls/devices provided	265.194(b)(2)	H351
	X			Uncovered tanks operated to ensure sufficient freeboard	265.194(b)(3)	H352
	X			Monitoring equipment data inspected once each operating day	265.195(a)	H353
	X			Overfill/spill control equipment inspected daily	265.195(a)(1)	H354
	X			Construction materials of tanks inspected daily	265.195(a)(4)	H355
	X			Externally accessible portion of tank system inspected daily	265.195(a)(4)	H356
X				All hazardous waste removed from tanks and related appurtenances at closure <i>will be certified by PE.</i>	265.197	H357
	X			Proper placement of ignitable or reactive waste	265.198(a)	H358
	X			Tanks in which ignitable or reactive waste is treated or stored meets NFPA buffer zone requirements	265.198(b)	H359
	X			Precautions taken for handling ignitable, reactive or incompatible waste or materials	265.199	H360

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

RECEIVED
PA/DC SECTION

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

SEP 27 1994

Date of Inspection 7/25/1994 Time start 1:00 pm Time finish 4:00 pm
Name of Inspector Dennis B. HARNEY
Company, installation name CRC Chemicals, Inc.
Location 885 Louis DRIVE
County Bucks Municipality Warminster
Identification number PAD069880029
Name of responsible official Richard Miller
Title VP Research + Dvlpmnt.
Mailing Address 885 Louis DR. Warminster PA 18974
Area code and telephone number (215) 674-4300
Name of person interviewed Adam Selick
Title Environmental + Safety Coordinator
Mailing address (if different from above) 885 Louis Dr. Warminster, PA 18974.
Area code and telephone number (215) 442-6223

1. Current waste handling method:

- | | | | | |
|---|-------------------------------------|-----------------------------------|--|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 27,643 kg./mo. 37,696 lbs/3mos. 3/31/94
b. 331,724 kg./yr. ~ 10,000 lbs/mo. (avg)

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F002	Safety Klean Enviro Systems	New Castle, KY Incinerator (fuel blending)
D001	Safety Klean Enviro Systems.	Linden, NJ Incinerator/Transfer

4. Source Reduction: ☐ accomplished, ☒ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B

Site Name CAC Chemicals, Inc ID Number AD069880029 Date 7/25/1994

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
		✓		Hazardous waste determination, performed on all waste streams	262.11	H001
✓				Identification number	262.12	H002
✓				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
	✓			Authorization received from TSD facility for wastes shipped off-site within PA (Shipped to KY)	262.13	H004
	✓			PA manifest used for intrastate shipments	262.20(b)	H005
✓				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
✓				Manifests filled out properly and completely	262.20(g)	H007
		✓		Manifests routed properly and within time limits (7 days) 5/2/1994	262.23(e)(f)	H008
✓				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
		✓		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
✓				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
		✓		Placards offered to transporter	262.33	H012
✓				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
		✓		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
			✓	Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
✓				a). All containers of haz. waste in good condition	265.171	H016
✓				b). Containers compatible with hazardous waste being stored within	265.172	H017
✓				c). Containers of hazardous waste kept closed	265.173(a)	H018
✓				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
			✓	e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
			✓	f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
✓				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - 177	H022
			✓	h). Proper containment and collection system(s)	265.178	H023
			✓	Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
		✓		On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
✓				Records retained at designated location for 20 years	262.40(a)	H026
✓				Quarterly reports submitted to the Department	262.41(a)	H027
	✓			Exception reporting procedures followed	262.42	H028
		✓		Hazardous waste disposal plan, if required	262.45	H029
✓				Spill reporting procedures followed	262.46(a)	H030
		✓		Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	✓			Special requirements followed for international shipments	262.50, 53, 55, 60	H032
		✓		Source reduction strategy prepared and available	262.80	H033

RECEIVED
PA/BC SECTION
SEP 27 1994

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 7/25/1994 Identification Number PAD 069880029

Company/Facility/Site Name CRC Chemicals, Inc.

D. HARNEY and C Sharp of PADER were given verbal approval by Adam Selisker, Environmental and Safety Coordinator at CRC chemicals along to tour the facility. MR Selisker joined the inspectors on the inspection, as did Joe Winickas of CRC Chemicals.

CRC Chemicals is listed as a Hazardous Waste TSD facility due to a storage tank that at one time was utilized for the storage of Hazardous Waste. This tank is no longer used for any storage or accumulation of hazardous waste. Therefore, CRC Chemicals would like to be removed from the Haz. Waste TSD list. They wish to be identified only as a generator with respect to Hazardous Waste.

Drums are currently and will continue to be used for hazardous waste accumulation for off-site disposal. The disposal facility to which waste is sent is:

Safety Kleen Environmental Systems, State Highway 146, New Castle, KY 40050. Only F002 waste is shipped.

Testing of products is conducted in a "salt-fog" cabinet in the laboratory. Product is applied to metal plates of approximately 3" x 6" dimensions, approx 1/16" thick. When testing is complete, the plates are discarded with municipal waste. Volume generated is approximated (by CRC Chem.) at 10-15 pounds per month. C. Sharp informed MR. Selisker that these plates are residual waste, and advised him that the disposal facility should be notified, and that he check to see if the MW disposal facility is permitted for RW.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy sent to facility Date 9/14/94
Inspector (signature) Dennis Harney Date 9/14/94

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENTRECEIVED
PA/BC SECTION

INSPECTION REPORT COMMENTS

SEP 27 1994

Date of Inspection 7/25/1994 Identification Number PAD 069880029Company/Facility/Site Name CRC Chemicals, Inc.

Two red flip-top containers are used in the laboratory for daily accumulation of waste solvent. The lettering on the cans is questionably legible, and it is recommended that the cans be labelled in a more legible fashion. It is also recommended that these cans be emptied daily, or more frequently if necessary. Information indicating daily removal of waste is recommended to be added to the containers.

Beside the "gasing room," a barrel is kept for the disposal of defective cans after they have been filled with product. It is recommended that this barrel be labeled with appropriate information to ensure safety of workers.

At the time of inspection, four barrels on a pallet were strapped together and labelled as Haz. Waste. The HW labels lacked ~~the~~ proper EPA waste ID numbers. This is a violation of 25 PA Code § 265.173(c). These barrels were located near the gasing room.

At the time of inspection, 15 barrels were waiting for removal - they contained D001 waste including mostly used rags. These barrels were ~~was~~ labelled as "RQ HW solid NOS" with an accumulation start date of 5/11/94. Mr. Selisker informed me that this waste resulted from a "thorough housecleaning" and that this type of accumulation is not standard.

Outside of the boiler room and next to the blending room, there were 42 drums of liquid waste palletted, prepared for removal. All drums were physically in good condition. Nine of the drums lacked an accumulation start date.

This is a violation of 25 PA Code § 262.34(a)(4).

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy sent to facility Date 9/14/94

Inspector (signature) Dennis Farney Date 9/14/94

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 7/25/1994 Identification Number PHD 069888029
Company/Facility/Site Name CRC Chemicals, Inc

Thirty eight of the drums were lacking CPA waste identification numbers or other information accurately identifying their contents. As with the four barrels near the gasing room, this ~~was~~ lack of waste identification is a violation of 25 PA Code § 245.173(c).

Outside the blending room, there were 4 Haz-Waste drums, all lacking waste identification on the label, also a violation of 25 PA Code § 245.173(c).

None of the areas in which HW drums were kept had proper containment and collection systems. This is a violation of 25 PA Code § 245.178. Once the HW storage tank has been certified closed, CRC Chemicals would like to use the containment area for the "storage" of drums within the 90

None of the hazardous waste accumulation areas were inspected on a weekly (or more frequent) basis. This is a violation of 25 PA Code § 245.174.

Non-compliance with Subchapter I (§245.171-245.178) is a violation of generator requirements; 25 PA Code § 242.34 (a)(3).

5 violations observed.

Other observations/comments:

Due to time constraints, documentation of HW determination, classroom training, PPC Plan, and Source reduction Strategy was not obtained. These issues will be addressed in subsequent inspections.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy sent to facility Date 9/14/94
Inspector (signature) Donna Henry Date 9/14/94

RECEIVED
PA/DC SECTION

SEP 27 1994

Inspection Report/Data Entry

Land Ban
TC Rule
TSD

Site I.D. # RAV0698800219 Telephone # _____
 Site Name CRC Industries, Inc Operator Name _____
 Address 895 Louis Drive Address _____
Warminster, Pa.
 Municipality Warminster Twp. County Bucks
 Responsible Official Gene Fleischman Title President
 Person Interviewed Richard Miller Title V.P. Research & Dev.
 Inspector Fred Walter Time _____

Date	Inspection Date	Inspection Type	Facility Type	Inspector I.D. #	# Violation
<u>07/28/92</u>	<u>07/28/92</u>	<u>01</u>	<u>06</u>	<u>21574</u>	<u>00</u>
Comment <u>CIT EPA</u>					

Sample # Low 00000 Sample # High 00000

Monitoring Points Sampled

<u>0000</u>	<u>0000</u>	<u>0000</u>	<u>0000</u>	<u>0000</u>	<u>0000</u>	<u>0000</u>
<u>0000</u>	<u>0000</u>	<u>0000</u>	<u>0000</u>	<u>0000</u>	<u>0000</u>	<u>0000</u>

INSPECTION TYPE

FACILITY TYPE

INSPECTION TYPE		Municipal	Residual	Hazardous
01 Routine	10 Survey	01 Municipal Waste Landfill	06 Landfill	01 Disposal
02 Spill Response	11 Part B	02 Construction/Demolition	07 Demolition	02 Treatment
03 Remedial Action	12 Complaint	Landfill	08 Processing	03 Storage
04 Follow Up	13 Withdrawn	03 Processing	09 Incinerator	04 Transporter
05 Crit Stage	14 Closure	04 Incinerator	10 Surface Application	05 Permit by Rule
06 Sample Only	15 Post Closure	05 Surface Application	11 Surface Impoundment	06 Generator
07 Permitting	16 Form 4		12 Surface Injection Well	07 SQG
08 Superfund	17 Form 4 w/sample			08 RRR
09 Ground Water	50 Record Rev			09 Other
	99 Other			50 Superfund

Hazardous Waste Inspection Report
Generators - Part ALand Ban
TC Rule

Date of inspection 7-28-92 Time start _____ Time finish _____
 Name of inspector Ted Walter
 Company, installation name CRC Industries, Inc.
 Location 885 Louis Drive Warminster, Pa. 18974
 County Bucks Municipality Warminster Twp.
 Identification number PA-D 069880029
 Name of responsible official Gene Fleischman
 Title President
 Mailing address 885 Louis Drive, Warminster, Pa. 18974
 Area code and telephone number (215) 674-4300
 Name of person interviewed Richard Miller
 Title V.P. Research & Development
 Mailing address (if different from above) See above
 Area code and telephone number See above

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 24,000 ~ 15,000 L. kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number

Destination Facility

Location and Type

F003 (Methyl Chloroform, Xylene)	Safety Kleen Corp.	1200 Sylvan St. Linden, N.J. 0703
F002 (1,1,1 Trichloroethane)	Waste Conversion, Inc.	2869 Sandstone Drive Hatfield, Pa. 19440
F003		

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			262
X				Hazardous waste determination, copies available		.11
X				Identification number		.12(a)
X				Hazardous waste shipments offered only to licensed transporters		.12(d)
X				Authorization received from TSD facility for wastes shipped off-site		.13
X				PA manifest used for intrastate shipments		.20(b)
	X			Disposer state manifest or EPA format manifest used for out-of-state shipments		.20(c)
X				Manifests filled out properly and completely		.20(g)
X				Manifests routed properly and within time limits (7 days)		.23(e) or (f)
	X			Proper U.S. DOT shipping containers or packages		.30(1)
	X			Shipping containers marked and labeled according to U.S. DOT		.30(2)
X				Containers of 110 gal. or less marked with required PA label		.30(3)
	X			Placards offered to transporter		.33
X				Wastes accumulated on-site for less than 90 days		.34(1)
X				Wastes stored in proper containers and properly marked and labeled		.34(2)
X				Containers managed in accordance with 265.171-.177		.34(3)
X				Containers clearly marked with accumulation date and visible for inspection		.34(4)
X				Records retained at designated location for 20 years		.40
X				Quarterly reports submitted to the Department		.41
X				Exception reporting procedures followed		.42
X				Hazardous waste disposal plan, if required		.45
X				Spill reporting procedures followed		.46(a)
X				Preparedness, Prevention and Contingency Plan and implemented		.46(e)
	X			Special requirements followed for international shipments		50.53.55.60
X				On the job or classroom personnel training program 265.16		.34(a)(5)
	X			Drum accumulation area inspected weekly as per 265.174 <i>see comments</i>		.34(a)(3)

Inspection Report Comments

Date of Inspection 7/28/92 Identification Number PAD 06988002
Company/Facility/Site Name CRC Industries, Inc.

Permission to conduct an inspection is granted by Mr. Richard Miller

The waste aerosol cans that are off-spec. are ground up and drained of the liquids e.g. parts cleaners, brake fluid & de-rust agents. These liquids are then deposited into the waste tank.

The F003 hazardous wastes are stored in an above ground 5,000 G. tank with proper containment provided.

The F003 waste is blended as a fuel for the incinerator of the facility which purchases the wastestream for fuel recovery.

Notice of Land Disposal Restriction of Waste and Certificate of Reassurance are attached referencing Manifest NJA 120643.

The Linden Recycle Center ships the vast majority of their waste fuels to Safety Kleen's fuel blending facility in Holly Hill, S.C.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) [Signature] Date 7/28/92
Inspector (signature) Fred Walter Date 7/28/92
Page 1 of 1

Inspection Report Comments

Date of Inspection 7/28/92 Identification Number PAD 069880029
Company/Facility/Site Name CKC Industries, Inc.

Land Disposal Restriction Notification
Certification referencing Manifest
PAC 5764172 are attached.

The flush-out rinseate is collected
in 55 G. steel drums and at the end of
the business day this wastestream is
pumped into the 5,000 G. above ground
storage tank. The majority of this rinse
is incorporated into the process.

The containment system for the 5,000 G.
above ground storage tank (490 day) is
free of cracks and is epoxy-coated.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

J. Miller

Date

7/28/92

Inspector (signature)

Fred Walter

Date

7/28/92Page 1 of 1

1—No Violation Observed				2—Not Applicable				3—Not Determined				4—Non-Compliance			
Status				REQUIREMENT								Chapter Citation			
1	2	3	4									264	265		
X				Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material.								.17(b)	.17(b)		
X				Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.								.194(a)	.194(a)		
	X			Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.								.194(c)	.194(c)		
	X			Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.								194(c)	194(c)		
	X			Continuously fed tanks equipped with a means to stop the inflow.								194(d)	194(d)		
X				Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.								194(e)	193		
X				Monitoring equipment data inspected once each operating day.								195(a)(2)	195(2)		
X				Liquid level of tanks inspected once each operating day.								195(a)(3)	195(3)		
X				Construction materials of tanks inspected weekly.								195(a)(4)	195(4)		
	X			Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.								195(a)(5)	195(5)		
	X			All hazardous waste removed from tanks and related appurtenances at closure.								197	197		
	X			Placement of ignitable or reactive waste only with the Department's approval.								198(a)	198(a)		
	X			Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements.								198(b)	198(b)		
	X			Precautions taken for handling ignitable, reactive or incompatible waste on materials.								199	199		
	X			Waste analyses and/or trial tests conducted on hazardous waste substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.								194(f)	194(e)		
X				Discharge control equipment inspected once each operating day.								195(a)(1)	195(1)		
X				Tanks labeled to accurately identify hazardous waste contained.								Act 97 6018.501 (b)(z)			

LAND DISPOSAL RESTRICTION NOTIFICATION/CERTIFICATION

(A separate form is required for each approval code)

Generator Name: C R C Chemical Inc Approval Code: AD27126
 Generator EPA ID Number: PAD069880029 Manifest Number: PAC5764172 /

This form is submitted to Waste Conversion Inc in accordance with the regulations published by EPA in CFR 268, which govern the land disposal of certain untreated hazardous wastes. In accordance with the waste analysis and record keeping requirements specified in 40 CFR 268.7, I have marked the appropriate box(es) below which indicate(s) how my waste must be managed to conform to the land disposal restrictions. The applicable treatment standards for the "F" Solvent, California Listed, and heavy metal contaminated wastes is listed on the back of this form. Treatment standards for all other waste codes and/or categories can be found in 40 CFR regulations, section 268.41, 268.42, and/or 268.43.

This waste is a Non-Wastewater unless this box is checked ☐ indicating wastewater.

EPA Waste Code	Category/Subcategory and/or Constituent of concern.	Treatment Standard Reference and Treatment 5 Letter BDAT Treatment Code or Concentration	Check box(es) Corresponding to the Section(s) Listed Below.	Variance Expiration Date
			A B C D E F G	
F002	111 Trichloroethane	268.41 see back	X	
F003	Xylene	268.41 see back	X	

A. Restricted Waste Requires Treatment

I am the generator of an untreated waste identified above which must be treated to the appropriate treatment standard set forth in 40 CFR 268 Subpart D.

B. Restricted Waste Treated to Performance Standards

The waste identified above has been treated in compliance with the applicable performance standards specified in 40 CFR 268 Subpart D. The treatment residues were tested and have been found to meet the performance standard specified in 40 CFR Subpart 268.41 or 268.43

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the process used to support certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has operated and maintained properly so as to comply with the performance levels specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

C. Restricted Waste Treatment by Specified Technology

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

D. Restricted Waste Meets Treatment Standards Without Prior Treatment

The waste identified above naturally meets the performance standards of 40 CFR 268 Subpart D or 40 CFR 268.32 without any treatment being performed.

"I certify under penalty of law that I personally have examined and am familiar with the waste analysis and testing of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

E. Restricted Waste Subject to a Variance

The waste identified is not banned from land disposal in units meeting minimum technology standards since it is subject to a national capacity variance, a treatment variance, or a case-by-case extension which will expire date indicated above.

F. Appendix IV - Organometallic Lab Packs

"I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only the wastes specified in Appendix IV to Part 268 or solid wastes not subject to regulation under 40 CFR part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

G. Appendix V - Organic Lab Packs

"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste that the lab pack contains only organic waste specified in Appendix V to Part 268 or solid waste not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

(A separate form is required for each approval code)

This form is submitted to Waste Conversion Inc in accordance with the regulations published by EPA in CFR 268, which govern the land disposal of certain untreated hazardous wastes. In accordance with the waste analysis and record keeping requirements specified in 40 CFR 268.7, I have marked the appropriate box(es) below which indicate(s) how my waste must be managed to conform to the land disposal restrictions. The applicable treatment standards for the "F" Solvent, California Listed, and heavy metal contaminated wastes is listed on the back of this form. Treatment standards for all other waste codes and/or categories can be found in 40 CFR regulations, section 268.41, 268.42, and/or 268.43.

This waste is a Non-Wastewater unless this box is checked ☐ indicating wastewater

EPA Waste Code	Category/Subcategory and/or Constituent of concern.	Treatment Standard Reference and Treatment 5 Letter BDAT Treatment Code or Concentration	Check box(es) Corresponding to the Section(s) Listed Below.	Varian Expiration Date
----------------------	--	--	---	------------------------------

[illegible]

A. Restricted Waste Requires Treatment

I am the generator of an untreated waste identified above which must be treated to the appropriate treatment standard set forth in 40 CFR 268 Subpart D.

B. Restricted Waste Treated to Performance Standards

The waste identified above has been treated in compliance with the applicable performance standards specified in 40 CFR 268 Subpart D. The treatment residues were tested and have been found to meet the performance standard specified in 40 CFR Subpart 268.41 or 268.43

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the process used to support certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has operated and maintained properly so as to comply with the performance levels specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

C. Restricted Waste Treatment by Specified Technology

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

D. Restricted Waste Meets Treatment Standards Without Prior Treatment

The waste identified above naturally meets the performance standards of 40 CFR 268 Subpart D or 40 CFR 268.32 without any treatment being performed.

I certify under penalty of law that I personally have examined and am familiar with the waste analysis and testing of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

III. Restricted Waste Subject to a Variance

The waste identified is not banned from land disposal in units meeting minimum technology standards since it is subject to a national capacity variance, a treatment variance, or a case-by-case extension which will expire date indicated above.

F Appendix IV - Organometallic Lab Packs

"I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only the wastes specified in Appendix to part 268 or solid wastes not subject to regulation under 40 CFR part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

G. Appendix V - Organic Lab Pack:

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste that the lab pack contains only organic waste specified in Appendix V to Part 265 or solid waste not subject to regulation under 40 CFR Part 261. I am aware there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

1200 Sylvan St.

Linden, NJ 07036

Under manifest number NJA 1A0648 line number 11a (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D001 F003 F005

F001-F005 Spent Solvents

Regulated Hazardous Constituent	TREATMENT STANDARDS (mg/l)		Check All That Apply
	Wastewater w/Solvents	All Other Solvent Wastes	
Acetone	0.05	0.59	<input checked="" type="checkbox"/>
Benzene	0.07	3.7	<input type="checkbox"/>
n-Butyl alcohol	5.0	5.0	<input type="checkbox"/>
Carbon disulfide	1.05	4.81	<input type="checkbox"/>
Carbon tetrachloride	0.05	0.96	<input type="checkbox"/>
Chlorobenzene	0.15	0.05	<input checked="" type="checkbox"/>
Cresols (and cresylic acid)	2.82	0.75	<input checked="" type="checkbox"/>
Cyclohexanone	0.125	0.75	<input type="checkbox"/>
1,2-Dichlorobenzene	0.68	0.125	<input type="checkbox"/>
Ethyl acetate	0.05	0.75	<input checked="" type="checkbox"/>
Ethyl benzene	0.05	0.053	<input type="checkbox"/>
Ethyl ether	0.05	0.75	<input type="checkbox"/>
Isobutanol	5.0	5.0	<input type="checkbox"/>
Methanol	0.25	0.75	<input checked="" type="checkbox"/>
Methylene chloride	0.2	0.96	<input checked="" type="checkbox"/>
Methylene chloride (from Pharm. Industry)	0.44	0.96	<input type="checkbox"/>
Methyl ethyl ketone	0.05	0.75	<input checked="" type="checkbox"/>
Methyl isobutyl ketone	0.05	0.33	<input type="checkbox"/>
Nitrobenzene	0.65	0.125	<input type="checkbox"/>
Pyridine	1.12	0.33	<input type="checkbox"/>
Tetrachloroethylene	0.079	0.05	<input type="checkbox"/>
Toluene	1.12	0.33	<input checked="" type="checkbox"/>
1,1,1-Trichloroethane	1.05	0.41	<input checked="" type="checkbox"/>
1,1,2-Trichloroethane	0.03	7.6	<input type="checkbox"/>
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	<input checked="" type="checkbox"/>
Trichlorethylene	0.062	0.091	<input type="checkbox"/>
Trichlorofluoromethane	0.05	0.96	<input type="checkbox"/>
Xylene	0.05	0.15	<input checked="" type="checkbox"/>

California List Prohibited Wastes

	Level (mg/l)	Treatment Standard
Halogenated Organic Compounds	1000.0	Incineration
Arsenic (As) Nonwastewaters	500.0	None
Mercury (Hg) Nonwastewaters	20.0	None
Nickel (Ni)	134.0	None
Thallium (Tl)	130.0	None
Chlorinated Biphenyls (PCB's)	50.0	Incineration

Waste Descriptions and/or Treatment Subcategory

Waste Description	Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)		Check All That Apply
	Wastewaters	Nonwastewaters	
001: Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	NA	
Low TOC Ignitable Liquids (<10 wt% TOC)	NA	268.42(a) DEACT	
High TOC Ignitable Liquids (>10 wt% TOC)	NA	268.42(a) RORGS, FSUBS, or INCIN	<input checked="" type="checkbox"/>
002 Corrosives, all subcategories & CA list	268.42(a) DEACT	268.42(a) DEACT	
004 Arsenic (As)	268.43(a)	268.41(a)	
005 Barium (Ba)	268.43(a)	268.41(a)	Variance until 5-8-92
006 Cadmium (Cd)	268.43(a)	268.41(a)	
007 Chromium (Cr)	268.43(a)	268.41(a)	
008 Lead (Pb)	268.43(a)	268.41(a)	
009: Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	268.41(a)	
High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	268.42(a) RMERC	Variance until 5-8-92
010 Selenium (Se)	268.43(a)	268.41(a)	Variance until 5-8-92
011 Silver (Ag)	268.43(a)	268.41(a)	

Other Codes See attachment for supplemental list

Generator Name: CRC CHEMICALS

EPA ID: PAD069880029

Generator Representative Signature: Tom BrownName & Title of Representative: Tom Brown - Environmental Manager

Safety-Kleen Sample Number: 014256

Control Number: 0015188

OCT 07 1992

217

Hazardous Waste Inspection Report
Generators - Part ALard-Bar
TC Rule
SUM

Date of inspection 7-28-92 Time start _____ Time finish _____
 Name of inspector Ted Walter
 Company, installation name CRC Industries, Inc.
 Location 885 Louis Drive Warminster, Pa. 18974
 County Bucks Municipality Warminster Twp.
 Identification number PA-D 069880029
 Name of responsible official Gene Fleishman
 Title President
 Mailing address 885 Louis Drive, Warminster, Pa. 1897
 Area code and telephone number (215) 674-4300
 Name of person interviewed Richard Miller
 Title V.P. Research & Development
 Mailing address (if different from above) See above
 Area code and telephone number See above

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 7,000 ~ 15,000 lb. kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F003 (Methyl Chloroform, Xylene)	Safety Klean Corp.	1200 Sylvan St. Linden, N.J. 07031
F002 (1,1,1 Trichloroethane)	Waste Conversion, Inc.	2869 Sandstone Drive Hatfield, Pa. 19446
F003		

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			
X				Hazardous waste determination, copies available		.11
X				Identification number		.12(a)
X				Hazardous waste shipments offered only to licensed transporters		.12(d)
X				Authorization received from TSD facility for wastes shipped off-site		.13
X				PA manifest used for intrastate shipments		.20(b)
	X			Disposer state manifest or EPA format manifest used for out-of-state shipments		.20(c)
X				Manifests filled out properly and completely		.20(g)
X				Manifests routed properly and within time limits (7 days)		.23(e) or (f)
	X			Proper U.S. DOT shipping containers or packages		.30(1)
	X			Shipping containers marked and labeled according to U.S. DOT		.30(2)
X				Containers of 110 gal. or less marked with required PA label		.30(3)
	X			Placards offered to transporter		.33
X				Wastes accumulated on-site for less than 90 days		.34(1)
X				Wastes stored in proper containers and properly marked and labeled		.34(2)
X				Containers managed in accordance with 265.171-.177		.34(3)
X				Containers clearly marked with accumulation date and visible for inspection		.34(4)
X				Records retained at designated location for 20 years		.40
X				Quarterly reports submitted to the Department		.41
X				Exception reporting procedures followed		.42
X				Hazardous waste disposal plan, if required		.45
X				Spill reporting procedures followed		.46(a)
X				Preparedness, Prevention and Contingency Plan and implemented		.46(e)
	X			Special requirements followed for international shipments		50.53.55.60
X				On the job or classroom personnel training program 265.16		.34(a)(5)
	X			Drum accumulation area inspected weekly as per 265.174 <i>see comments</i>		.34(a)(3)

Inspection Report Comments

Date of Inspection

7/28/92

Identification Number

PAD 069880029

Company/Facility/Site Name

CRC Industries, Inc.

Permission to conduct an inspection is granted by Mr. Richard Miller

The waste aerosol cans that are off-spec. are ground up and drained of the liquids e.g. parts cleaners, brake fluid & de-rustin agents. These liquids are then deposited into the waste tank.

The F003 hazardous wastes are stored in an above ground 5,000 G. tank with proper containment provided.

The F003 waste is blended as a fuel for the incinerator of the facility which purchases the wastestream for fuel recovery.

Notice of Land Disposal Restriction of Waste and Certificate of Reassurance are attached referencing Manifest NJA 1206435

The Linden Recycle Center ships the vast majority of their waste fuels to Safety Kleen's fuel blending facility in Holly Hill, S.C.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

R. Miller

Date

7/28/92

Inspector (signature)

Fred Walter

Date

7/28/92

Page

of



Inspection Report Comments

Date of Inspection

7/28/92

Identification Number

PAD 069880029

Company/Facility/Site Name

CKC Industries, Inc.

Land Disposal Restriction Notification
Certification referencing Manifest
PAC 5764172 are attached.

The flush-out rinseate is collected
in 55 gal. steel drums and at the end of
the business day this wastestream is
pumped into the 5,000 gal. above ground
storage tank. The majority of this rinse
is incorporated into the process.

The containment system for the 5,000 gal.
above ground storage tank (480 day) is
free of cracks and is epoxy-coated.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

J. Miller

Date

7/28/92

Inspector (signature)

Fred Walter

Date

7/28/92

Page ____ of ____



Hazardous Waste Inspection Report
~~TSD Facilities~~ — Storage (Tanks)

1—No Violation Observed				2—Not Applicable				3—Not Determined				4—Non-Compliance			
Status				REQUIREMENT								Chapter Citation			
1	2	3	4									264, 265			
X				Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material.								.17(b).17(b)			
X				Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.								.194(a).194(a)			
	X			Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.								.194(b).194(b)			
	X			Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.								194(c).194(c)			
	X			Continuously fed tanks equipped with a means to stop the inflow.								194(d).194(d)			
X				Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.								194(e).194(e)			
X				Monitoring equipment data inspected once each operating day.								195(a)(2).195(a)(2)			
X				Liquid level of tanks inspected once each operating day.								195(a)(3).195(a)(3)			
X				Construction materials of tanks inspected weekly.								195(a)(4).195(a)(4)			
	X			Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.								195(a)(5).195(a)(5)			
	X			All hazardous waste removed from tanks and related appurtenances at closure.								197.197			
	X			Placement of ignitable or reactive waste only with the Department's approval.								198(a).198(a)			
	X			Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements.								198(b).198(b)			
	X			Precautions taken for handling ignitable, reactive or incompatible waste or materials.								199.199			
	X			Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.								194(f).194(f)			
X				Discharge control equipment inspected once each operating day.								195(a)(1).195(a)(1)			
X				Tanks labeled to accurately identify hazardous waste contained.								Act 97 6018.501 (b)(z)			

(A separate form is required for each approval code)

"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste and that the lab pack contains only organic waste specified in Appendix V to Part 268 or solid waste not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

LAND DISPOSAL RESTRICTION NOTIFICATION/CERTIFICATION

(A separate form is required for each approval code)

Generator Name: C R C Chemical Inc Approval Code: AD27126
 Generator EPA ID Number: PAD069880029 Manifest Number: PAC5764172 /

This form is submitted to Waste Conversion Inc in accordance with the regulations published by EPA in CFR 268, which govern the land disposal of certain untreated hazardous wastes. In accordance with the waste analysis and record keeping requirements specified in 40 CFR 268.7, I have marked the appropriate box(es) below which indicate(s) how my waste must be managed to conform to the land disposal restrictions. The applicable treatment standards for the "F" Solvent, California Listed, and heavy metal contaminated wastes is listed on the back of this form. Treatment standards for all other waste codes and/or categories can be found in 40 CFR regulations, section 268.41, 268.42, and/or 268.43.

This waste is a Non-Wastewater unless this box is checked ☐ indicating wastewater.

EPA Waste Code	Category/Subcategory and/or Constituent of concern.	Treatment Standard Reference and Treatment 5 Letter BDAT Treatment Code or Concentration	Check box(es) Corresponding to the Section(s) Listed Below:							Variance Expiration Date
			A	B	C	D	E	F	G	
F002	111 Trichloroethane	268.41 see back	X							
F003	Xylene	268.41 see back	X							

A. Restricted Waste Requires Treatment

I am the generator of an untreated waste identified above which must be treated to the appropriate treatment standard set forth in 40 CFR 268 Subpart D.

B. Restricted Waste Treated to Performance Standards

The waste identified above has been treated in compliance with the applicable performance standards specified in 40 CFR 268 Subpart D. The treatment residues were tested and have been found to meet the performance standard specified in 40 CFR Subpart 268.41 or 268.43

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the process used to support certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

C. Restricted Waste Treatment by Specified Technology

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

D. Restricted Waste Meets Treatment Standards Without Prior Treatment

The waste identified above naturally meets the performance standards of 40 CFR 268 Subpart D or 40 CFR 268.32 without any treatment being performed.

"I certify under penalty of law that I personally have examined and am familiar with the waste analysis and testing of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

E. Restricted Waste Subject to a Variance

The waste identified is not banned from land disposal in units meeting minimum technology standards since it is subject to a national capacity variance, a treatment variance, or a case-by-case extension which will expire date indicated above.

F. Appendix IV - Organometallic Lab Packs

"I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only the wastes specified in Appendix IV to Part 268 or solid wastes not subject to regulation under 40 CFR part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

G. Appendix V - Organic Lab Packs

"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste that the lab pack contains only organic waste specified in Appendix V to Part 268 or solid waste not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

TO SAFETY-KLEEN CORP

EPA ID NO. NJD002182897

1200 Sylvan St.

Linden, NJ 07036

Under manifest number NJA 106488 line number 11a (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D001 F003 F005

F001-F005 Spent Solvents

Regulated Hazardous Constituent	TREATMENT STANDARDS (mg/l)		Check All That Apply
	Wastewater w/Solvents	All Other Solvent Wastes	
Acetone	0.05	0.59	<input checked="" type="checkbox"/>
Benzene	0.07	3.7	<input type="checkbox"/>
n-Butyl alcohol	5.0	5.0	<input type="checkbox"/>
Carbon disulfide	1.05	4.81	<input type="checkbox"/>
Carbon tetrachloride	0.05	0.96	<input type="checkbox"/>
Chlorobenzene	0.15	0.05	<input checked="" type="checkbox"/>
Cresols (and cresylic acid)	2.82	0.75	<input checked="" type="checkbox"/>
Cyclohexanone	0.125	0.75	<input type="checkbox"/>
1,2-Dichlorobenzene	0.68	0.125	<input type="checkbox"/>
Ethyl acetate	0.05	0.75	<input checked="" type="checkbox"/>
Ethyl benzene	0.05	0.053	<input type="checkbox"/>
Ethyl ether	0.05	0.75	<input type="checkbox"/>
Isobutanol	5.0	5.0	<input type="checkbox"/>
Methanol	0.25	0.75	<input checked="" type="checkbox"/>
Methylene chloride	0.2	0.96	<input checked="" type="checkbox"/>
Methylene chloride (from Pharm. Industry)	0.44	0.96	<input type="checkbox"/>
Methyl ethyl ketone	0.05	0.75	<input checked="" type="checkbox"/>
Methyl isobutyl ketone	0.05	0.33	<input type="checkbox"/>
Nitrobenzene	0.65	0.125	<input type="checkbox"/>
Pyridine	1.12	0.33	<input type="checkbox"/>
Tetrachloroethylene	0.079	0.05	<input type="checkbox"/>
Toluene	1.12	0.33	<input checked="" type="checkbox"/>
1,1,1-Trichloroethane	1.05	0.41	<input checked="" type="checkbox"/>
1,1,2-Trichloroethane	0.03	7.6	<input type="checkbox"/>
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	<input checked="" type="checkbox"/>
Trichloroethylene	0.062	0.091	<input type="checkbox"/>
Trichlorofluoromethane	0.05	0.96	<input type="checkbox"/>
Xylene	0.05	0.15	<input checked="" type="checkbox"/>

California List Prohibited Wastes

	Level (mg/l)	Treatment Standard
Halogenated Organic Compounds	1000.0	Incineration
Arsenic (As) Nonwastewaters	500.0	None
Mercury (Hg) Nonwastewaters	20.0	None
Nickel (Ni)	134.0	None
Thallium (Tl)	130.0	None
Chlorinated Biphenyls (PCB's)	50.0	Incineration

Waste Descriptions and/or Treatment Subcategory

Waste Code	Description	Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)		Check All That Apply
		Wastewaters	Nonwastewaters	
001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	NA	
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA	268.42(a) DEACT	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA	268.42(a) RORGS, FSUBS, or INCIN	<input checked="" type="checkbox"/>
002	Corrosives, all subcategories & CA list	268.42(a) DEACT	268.42(a) DEACT	
004	Arsenic (As)	268.43(a)	268.41(a)	
005	Barium (Ba)	268.43(a)	268.41(a)	
006	Cadmium (Cd)	268.43(a)	268.41(a)	
007	Chromium (Cr)	268.43(a)	268.41(a)	
008	Lead (Pb)	268.43(a)	268.41(a)	
009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	268.41(a)	
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	268.42(a) RMERC	
010	Selenium (Se)	268.43(a)	268.41(a)	
011	Silver (Ag)	268.43(a)	268.41(a)	

Other Codes See attachment for supplemental list

Generator Name: CRC CHEMICALS

EPA ID: PAD069880029

Generator Representative Signature: John BrownName & Title of Representative: John Brown - Environmental Manager

Safety-Kleen Sample Number: 014256

Control Number: 0015188

Hazardous Waste Inspection Report
Generators - Part A0 v10
GEN/TSD

Date of inspection 3-7-90 Time start 11:45 Time finish 1:30
 Name of inspector Fred Walter
 Company, installation name CRC Industries
 Location 885 Louis Drive, Warminster, Pa.
 County Bucks Municipality Warminster Twp
 Identification number PAD 069 880029
 Name of responsible official Charles Grober
 Title V-P Production
 Mailing address 885 Louis Drive, Warminster, Pa. 18977
 Area code and telephone number 215-674-4300
 Name of person interviewed Joe Windisch
 Title Maintenance Supervisor
 Mailing address (if different from above) _____
 Area code and telephone number See above

1. Current waste handling method:

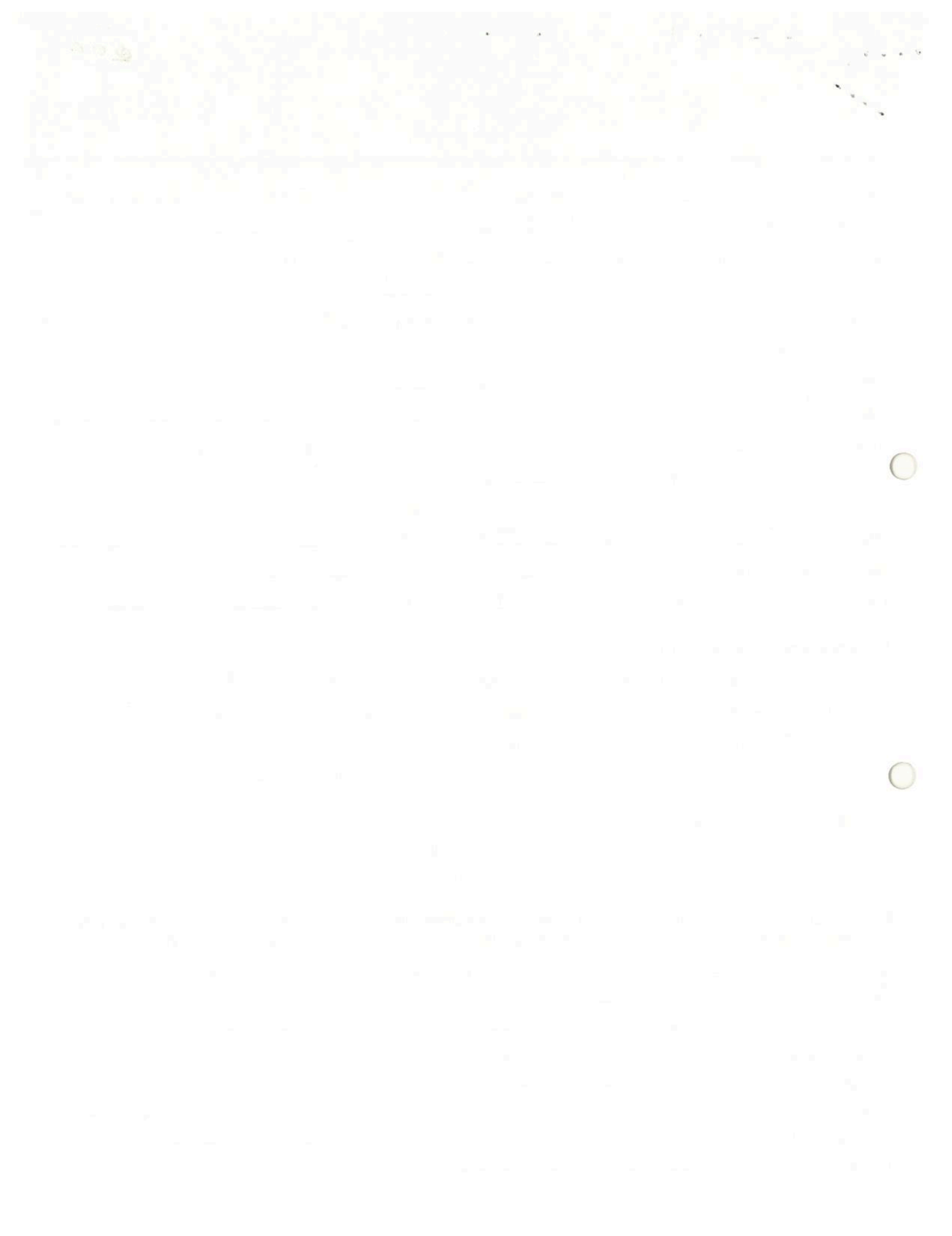
- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 40,000 P/yr. kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
For 3 (acetone, chlorobenzene, Cresols, Methylol, methylene chloride, Methanol, Toluene, 1,1,1 Trichloro, 1,1,2 Trichloro)	Safety-Klen-Enviro System	State Hwy. 146, New Castle, Ky. 40051



Hazardous Waste Inspection Report
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
X				Hazardous waste determination, copies available		(b)
X				Identification number		(c)(1)
X				Hazardous waste shipments offered only to licensed transporters		(c)(4)
X				Authorization received from TSD facility for wastes shipped off-site		(d)
X				PA manifest used for intrastate shipments		(e)(2)
	X			Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
X				Manifests filled out properly and completely		(e)(7)
X				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
	X			Proper U.S. DOT shipping containers or packages		(f)(1)(i)
	X			Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
	X			Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
X				Placards offered to transporter		(f)(2)
X				Wastes accumulated on-site for less than 90 days		(g)(1)(i)
X				Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
	X			Containers managed in accordance with 75.265(q)(1)–(9)		(g)(1)(iii)
	X			Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
X				Records retained at designated location for 20 years		(h)
X				Quarterly reports submitted to the Department		(i)
X				Exception reporting procedures followed		(j)
X				Hazardous waste disposal plan, if required		(l)
X				Spill reporting procedures followed		(m)(1)
X				Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
	X			Special requirements followed for international shipments		(o)
				On the job or classroom personnel training program (75.265(f))		(g)(1)(6)
	X			Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)



Hazardous Waste Inspection Report
TSD Facilities — Storage (Tanks)

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.265
X				Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material.		(r)(2)
X				Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.		(r)(3)
	X			Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.		(r)(4)
	X			Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.		(r)(4)
	X			Continuously fed tanks equipped with a means to stop the inflow.		(r)(5)
X				Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.		(r)(6)
X				Monitoring equipment data inspected once each operating day. <i>Daily log</i>		(r)(8)(ii)
X				Liquid level of tanks inspected once each operating day.		(r)(8)(iii)
X				Construction materials of tanks inspected weekly.		(r)(8)(iv)
X				Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.		(r)(8)(v)
	X			All hazardous waste removed from tanks and related appurtenances at closure.		(r)(9)
X				Placement of ignitable or reactive waste only with the Department's approval.		(r)(10)
	X			Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements. <i>reactivity</i>		(r)(11)
X				Precautions taken for handling ignitable, reactive or incompatible waste or materials.		(r)(12), (13)
X				Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.		(r)(7)
X				Discharge control equipment inspected once each operating day. <i>Daily log</i>		(r)(8)(i)
X				Tanks labeled to accurately identify hazardous waste contained.		Act 97 Section 403(b)(2)

Department of Environmental Resources
Bureau of Waste Management
Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 3-7-90 Identification Number PAD 06988
Company, Installation Name CRC Industries
County Bucks Municipality Warminster T.

Schneider Tank Lines, Inc., Green
Wi., transports the F003 Hazardous wa
off site to the designated facility in a ta
truck.

Permission to conduct an inspection granted
by Mr. Windisch.

The F003 waste is blended as a fuel for
incinerator in New Castle, Ky. This suppl
mental fuel ash used in the cement kilns th
becomes an integral part of the cement kil
product.

The waste aerosol cans that are off spec. a
ground up & drained of the liquids e.g. parts
cleaners, brake fluid & de-rust agents. These li
uid wastes are then deposited into the waste

The F003 Hazardous wastes are stored in an
above ground 5,000 L. tank.

The information about the soil sample
test results when the product UST's were
removed should be forwarded to the Dept. of En
vironmental Resources. The tank sizes were: (3) 10,000 L.
and (2) 5,000 L.

This inspection report is official notification that a representative of the Department of Environmental
Resources, Bureau of Waste Management, inspected the above installation. The findings of this
inspection are shown in this report. Any violations which were uncovered during the inspection
are indicated. Violations may also be discovered upon examination of the results of laboratory
analyses and review of Department records. Notification will be forthcoming, confirming any viola
tions indicated herein and listing any additional violations.

Person Interviewed (signature) Joseph P. Smith Date 3-7-90
Inspector (signature) Fred Walters Date 3-7-90

JUL 21 1990

ER - WM-119: 9/88

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Waste Management

Inspection Report/Data Entry

Site I.D. # PA0069880029
 Site Name CRC Chemicals
 Address 885 Lower Merion
Warminster, Pa. 18974
 Municipality Warminster Twp
 Responsible Official Charles Grabe
 Person Interviewed " "
 Inspector Fred Walter

Telephone # 215-674-4300
Operator Name CRC Chemicals
Address 885 Louis Drive
Warrminster, Pa. 18974
County Bucks
Title V-P Production
Title " "
Time 9:00

Date	Inspection Date	Inspection Type	Facility Type	Inspector I.D. #	# Violation
	2/5/15	OI	OG	2157	011
Comment					

Sample # Low

Sample # High

Monitoring Points Sampled

INSPECTION TYPE

01 Routine	10 Survey
02 Spill Response	11 Part B
03 Remedial Action	12 Complaint
04 Follow Up	13 Withdrawn
05 Crit Stage	14 Closure
06 Sample Only	15 Post Closure
07 Permitting	16 Form 4
08 Superfund	17 Form 4 w/sample
09 Ground Water	50 Record Rev
	99 Other

FACILITY TYPE

Municipal	Residual	Hazardous
01 Municipal Waste Landfill	06 Landfill	01 Disposal
02 Construction/Demolition Landfill	07 Demolition	02 Treatment
03 Processing	08 Processing	03 Storage
04 Incinerator	09 Incinerator	04 Transporter
05 Surface Application	10 Surface Application	05 Permit by Rule
	11 Surface Impoundment	06 Generator
	12 Surface Injection Well	07 SQG
		08 RRR
		09 Other
		50 Superfund

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection 5-15-89 Time start 9:00 Time finish 11:30
 Name of inspector Fred Walter
 Company, installation name QKC Chemicals
 Location 885 Louis Drive Warminster, Pa. 18974
 County Bucks Municipality Warminster Twp.
 Identification number PAD 069880029
 Name of responsible official Charles Graber
 Title V-P Production
 Mailing address 885 Louis Drive Warminster, Pa. 18974
 Area code and telephone number 215-674-4300
 Name of person interviewed See above
 Title See above
 Mailing address (if different from above) _____
 Area code and telephone number See above

1. Current waste handling method:

- a. ☒ On-site ☐ treatment, ☒ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. ~ 3000 lb kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>F003</u>	<u>Safety/Kleen Enviro</u>	<u>State Highway 146</u>
<u>U-159, 226,</u>	<u>Systems</u>	<u>New Castle, Ky. 4005</u>
<u>239, 220,</u>		
<u>210</u>		
<u>Toluene, Xylene,</u>		
<u>1,1 TCE, Tetra</u>		
<u>chloroethylene,</u>		
<u>MFI</u>		

Hazardous Waste Inspection Report
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
X				Hazardous waste determination, copies available		(b)
X				Identification number		(c)(1)
X				Hazardous waste shipments offered only to licensed transporters <i>See comments</i>		(c)(4)
X				Authorization received from TSD facility for wastes shipped off-site		(d)
	X			PA manifest used for intrastate shipments		(e)(2)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
			X	Manifests filled out properly and completely		(e)(7)
X				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
	X			Proper U.S. DOT shipping containers or packages		(f)(1)(i)
	X			Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
	X			Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
		X		Placards offered to transporter		(f)(2)
				Wastes accumulated on-site for less than 90 days		(g)(1)(i)
	X			Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
	X			Containers managed in accordance with 75.265(q)(1)–(9)		(g)(1)(iii)
	X			Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
X				Records retained at designated location for 20 years		(h)
X				Quarterly reports submitted to the Department		(i)
X				Exception reporting procedures followed		(j)
X				Hazardous waste disposal plan, if required		(l)
X				Spill reporting procedures followed		(m)(1)
X				Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
	X			Special requirements followed for international shipments		(o)
X				On the job or classroom personnel training program [75.265(f)]		(g)(1)(6)
	X			Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report
TSD Facilities — Storage (Tanks)

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance	
Status				REQUIREMENT			Chapter Citation
1	2	3	4				75.26!
X				Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material.			(r)(2)
X				Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.			(r)(3)
X	X			Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.			(r)(4)
	X			Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.			(r)(4)
	X			Continuously fed tanks equipped with a means to stop the inflow.			(r)(5)
	X			Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.			(r)(6)
X				Monitoring equipment data inspected once each operating day.			(r)(8)(iii)
X				Liquid level of tanks inspected once each operating day. <i>daily log kept</i>			(r)(8)(iii)
X				Construction materials of tanks inspected weekly.			(r)(8)(iv)
X				Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.			(r)(8)(v)
	X			All hazardous waste removed from tanks and related appurtenances at closure.			(r)(9)
X				Placement of ignitable or reactive waste only with the Department's approval.			(r)(10)
		X		Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements.			(r)(11)
X				Precautions taken for handling ignitable, reactive or incompatible waste or materials.			(r)(12), (13)
	X			Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.			(r)(7)
X				Discharge control equipment inspected once each operating day. <i>daily log kept</i>			(r)(8)(i)
X				Tanks labeled to accurately identify hazardous waste contained.			Act 97 Section 403(b)(2)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 5-15-89 Identification Number PA 069880029
Company, Installation Name CRC Chemicals
County Bucks Municipality Miner's Twp.

Schneider Tank Lines, Inc., Green Bay, WI, transports Foo3 waste off site to the designated facility in a tanker truck.

The PA-AH number for Schneider Tank Lines has been incorrectly entered for a period of more than one year. The correct number is PA-AH 0213. (not PA-AH 0315)

This waste Foo3 is blended as a fuel for the incinerator in New Castle, Ky. To ash, in turn, then becomes an integral part of the cement kiln product.

The waste disposal cans that are off-spec. are ground up and drained of their liquid (parts clean, but fluid to rust agents).

No wastes (Foo3) are stored in containers.

The Foo3 waste tank has been labeled as such.

The dike around the waste storage tank pump has been repaired (previously had cracks).

Cracks in the rear wall of the tank storage area has to be repaired (parged or pointed).

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) CHARLES GRABER Date 5-15-89
Inspector (signature) Frank W. Lister Date 5-15-89

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Waste Management

Inspection Report/Data Entry

Site I.D. # RA1016191581010219 Telephone # 215-674-4300
 Site Name CRC Chemicals Operator Name CRC Chemicals
 Address 885 Louis Drive Address 885 Louis Drive
Warminster, Pa. 18974 Warminster, Pa. 18974
 Municipality Warminster Twp. County Bucks
 Responsible Official Charles Gruber Title V-P Production
 Person Interviewed " " Title " "
 Inspector Fred Walter Time 9:00

Date	Inspection Date	Inspection Type	Facility Type	Inspector I.D. #	# Violation
<u>11/15/89</u>	<u>015/15819</u>	<u>50</u>	<u>016</u>	<u>21514</u>	<u>01</u>
Comment <u>MIQ[N] FLEISI</u>					

Sample # Low 11111 Sample # High 11111

Monitoring Points Sampled

<u>11111</u>	<u>11111</u>	<u>11111</u>	<u>11111</u>	<u>11111</u>	<u>11111</u>
<u>11111</u>	<u>11111</u>	<u>11111</u>	<u>11111</u>	<u>11111</u>	<u>11111</u>

INSPECTION TYPE

FACILITY TYPE

INSPECTION TYPE		Municipal	Residual	Hazardous
01 Routine	10 Survey	01 Municipal Waste Landfill	06 Landfill	01 Disposal
02 Spill Response	11 Part B	02 Construction/Demolition	07 Demolition	02 Treatment
03 Remedial Action	12 Complaint	Landfill	08 Processing	03 Storage
04 Follow Up	13 Withdrawn	03 Processing	09 Incinerator	04 Transporter
05 Crit Stage	14 Closure	04 Incinerator	10 Surface Application	05 Permit by Rule
06 Sample Only	15 Post Closure	05 Surface Application	11 Surface Impoundment	06 Generator
07 Permitting	16 Form 4		12 Surface Injection Well	07 SQG
08 Superfund	17 Form 4 w/sample			08 RRR
09 Ground Water	<u>50</u> Record Rev			09 Other
	99 Other			50 Superfund

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection 5-15-89 Time start 9:00 Time finish 11:30
 Name of inspector Ted Walter
 Company, installation name CRC Chemicals
 Location 885 Louis Drive Warminster, Pa. 18974
 County Bucks Municipality Warminster Twp.
 Identification number PAD 069880029
 Name of responsible official Charles Graber
 Title V-P Production
 Mailing address 885 Louis Drive Warminster, Pa. 18974
 Area code and telephone number 215-674-4300
 Name of person interviewed see above
 Title see above
 Mailing address (if different from above) _____
 Area code and telephone number see above

1. Current waste handling method:

- a. ☒ On-site ☐ treatment, ☒ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. ~ 3000 L kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
FOO 3 (U-159, 226, 239, 220, 210)	Safety Kleen Enviro Systems	State Highway 146 New Castle, Ky 40050
Toluene, Xylene, 1,1,1 TCE Tetra- chloroethylene, MEK		

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 5-15-89 Identification Number PA0069880029
Company, Installation Name CRC Chemicals
County Bucks Municipality Wilmington Twp.

A review of the records at this facility shows that an incorrect PA-AH number 0315 has been incorrectly entered on the manifests for a period of more than one year. The correct PA-AH number for Schneider Tank Lines, Inc., Green Bay, Wisc. is PA-AH0213.

All other applicable records are in order at this time. (PPC Quarterly report on the job or classroom personnel training, etc.)

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Charles Gruber Date 5-15-89
Inspector (signature) Fred Walter Date 5-15-89

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - New York, New Jersey, and Pennsylvania

Philadelphia, PA 19106

SUBJECT: RCRA Inspection - *CRC Chemicals, Inc. - Warminster, Pa.*
PAD 069880029

DATE: *7/1/88*

FROM: *9K* Gregory A. Koltonuk, ~~████████████████████~~
RCRA Enforcement Section (JHW)

TO: File

Thru: *my 7/1/88*
VICKY BINETTI, CHIEF - RCRA Enforcement Section, (JHW15)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE
VIOLATIONS.

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection 5/4/88 Time start 0930 Time finish 1100
 Name of inspector Michael Pennella
 Company, installation name CRC Chemicals
 Location 885 Louis Drive Warminster
 County Bucks Municipality Warminster Twp.
 Identification number PAD069880029
 Name of responsible official Charles Graber
 Title V.P. of Production
 Mailing address 885 Louis Drive Warminster Pa
 Area code and telephone number (215) 674-4300
 Name of person interviewed SEE ABOVE
 Title SEE ABOVE
 Mailing address (if different from above) SEE ABOVE
 Area code and telephone number SEE ABOVE

1. Current waste handling method:

- | | | | | | |
|----|--|--|--|-----------------------------------|----------------------------------|
| a. | <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. | <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. | <input checked="" type="checkbox"/> Off-site | <input checked="" type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. | <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input checked="" type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. ~2500 kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

F003

{
 U159
 U226
 U234
 U240
 U270

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

Hazardous Waste Inspection Report
Generators — Part B

1—Non-Compliance, 2—Compliance, 3—Not Applicable, 4—Not Determined

Compliance Status				REQUIREMENT	Chapter Citation
1	2	3	4		
	✓			Identification number	75.262 (c)(1)
	✓			Hazardous waste shipments offered only to licensed transporters	(c)(4)
	✓			Authorization received from TSD facility for wastes shipped off-site	(d)
		✓		PA manifest used for intrastate shipments	(e)(2)
	✓			Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
	✓			Manifests filled out properly and completely	(e)(7)
	✓			Manifests routed properly and within time limits (7 days)	(e)(14) or (15)
		✓		Proper U.S. DOT shipping containers or packages	(f)(1)(i)
		✓		Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
		✓		Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)
			✓	Placards offered to transporter	(f)(2)
✓				Wastes accumulated on-site for less than 90 days	(g)(1)(i)
		✓		Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)
		✓		Containers managed in accordance with 75.265(q)(1)–(9)	(g)(1)(iii)
		✓		Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
	✓			Records retained at designated location for 20 years	(h)
	✓			Quarterly reports submitted to the Department	(i)
		✓		Exception reporting procedures followed	(j)
		✓		Hazardous waste disposal plan, if required	(l)
		✓		Spill reporting procedures followed	(m)(1)
	✓			Preparedness, Prevention and Contingency Plan and implemented (c)	(m)(5)
		✓		Special requirements followed for international shipments	(o)
	✓			On the job or classroom personnel training program (75.265(f))	(g)(1)(6)
		✓		Drum accumulation area inspected & inspection logged weekly as per 75.265(q)(5)	(g)(1)(iii)
✓				TANKS (see OTHER PAGE)	

Hazardous Waste Inspection Report

TSD Facilities — Storage (Containers and Tanks)

1—Non-Compliance, 2—Compliance, 3—Not Applicable, 4—Not Determined

Compliance Status					REQUIREMENT	Chapter Citation
1	2	3	4			75.265
		✓			Containers managed to prevent leaks and spills.	(q)(1), (4)
		✓			Containers are compatible with waste stored.	(q)(2)
		✓			Containers are closed during storage.	(q)(3)
		✓			Container storage area inspected weekly for leaks, deterioration, etc.	(q)(5)
		✓			Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q)(6)
✓					Satisfactory procedures followed for handling incompatible wastes.	(q)(7), (8)
		✓			Incompatible wastes separated or protected from other materials.	(q)(9)
✓					Containers and tanks labeled to identify accurately hazardous waste contained. <i>Tank needs to be labeled with waste *</i>	Act 97 Section 403(b)(2)
✓					Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material.	(r)(2)
✓					Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r)(3)
		✓			Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r)(4)
		✓			Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r)(4)
✓		✓			Continuously fed tanks equipped with a means to stop the inflow.	(r)(5)
✓					Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r)(6)
✓					Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r)(7)
✓					Discharge control equipment inspected once each operating day.	(r)(8)(i)
✓					Monitoring equipment data inspected once each operating day.	(r)(8)(ii)
✓					Liquid level of tanks inspected once each operating day.	(r)(8)(iii)
✓					Construction materials of tanks inspected weekly.	(r)(8)(iv)
✓					Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r)(8)(v)
		✓			All hazardous waste removed from tanks and related appurtenances at closure.	(r)(9)
✓					Placement of ignitable or reactive waste only with the Department's approval.	(r)(10)
		✓			Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements. NFPA	(r)(11)
✓					Precautions taken for handling ignitable, reactive or incompatible waste or materials.	(r)(12), (13)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 5/4/88 Identification Number AD069880029
Company, Installation Name CRC Chemicals
County Bucks Municipality Warminster Twp.

- 1) Company generates mixed solvent waste used in manufacturing of chemical lubricants, additives, penetrating oils, rust inhibitors etc.
- * 2) All Wastes are stored in one Above ground 5000 gallon storage Tank which is Diked for spills. This tank is pumped out on a three month interval - However it sometimes exceeds the 90 Day storage Requirement 75.262(g)(1)(i) by 7-10 days.
- 3) No wastes are stored in containers for shipment.
- 4) One quarterly report ~~for~~^{1st} quarter of 1988 ~~was~~ had no quantity. This was mailed to HBB. during the Department's inspection.
- 5) The Hazardous waste storage tank needs to be labeled with EPA Hazardous waste number F003.
- 6) The Sites PPC Plan needs to be amended to address the removal of underground storage tanks and construction of new Above ground Tanks. (APRIL 25, 1988)^{completed}
- 7) ~~There~~ Diking around waste storage tank pump is developing cracks. These should be repaired ASAP.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Charles Fisher Date 5/4/88
Inspector (signature) Michael Pennella Date 5/4/88



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street
Norristown, PA 19401
215 270-1948

May 6, 1988

Mr. Charles Graber
CRC Chemicals, Inc.
Louis Drive
Warminster, PA 18974

Re: Hazardous Waste Inspection
PAD069880029; 5/4/88
Warminster Township
Bucks County

NOTICE OF VIOLATION

Dear Mr. Graber:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

75.262(g)(1)(i) Waste shipments are not occurring within the required 90 day time limit.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

THE HISTORY OF THE UNITED STATES



The history of the United States is a complex and multifaceted story that spans centuries. It begins with the early Native American civilizations, such as the Mayans, Aztecs, and Incas, who built great empires in the Americas. The discovery of the New World by Christopher Columbus in 1492 marked the beginning of European colonization. The United States was founded as a new nation in 1776, and its history is marked by significant events, including the American Revolution, the Civil War, and the Great Depression. The country has grown from a small colony to a global superpower, and its history continues to shape the world today.

The early history of the United States is characterized by the presence of Native American tribes, who lived in the land for thousands of years before the arrival of European settlers. These tribes had diverse cultures, languages, and ways of life. Some, like the Mayans and Aztecs, were highly organized and built complex societies. Others, like the Iroquois, were more nomadic and lived in small groups. The European settlers, who arrived in the late 15th and early 16th centuries, brought with them a different way of life, including agriculture, trade, and a different set of values. The interaction between the two groups was often fraught with conflict, but it also led to the exchange of ideas and technologies.

The American Revolution, which began in 1775 and ended in 1783, was a pivotal moment in the history of the United States. It was a war for independence from British rule, and it resulted in the creation of a new nation. The revolution was fought on many fronts, including the battlefield, the courtroom, and the streets. The Declaration of Independence, signed in 1776, was a landmark document that declared the United States to be a sovereign and independent nation. The Constitution, signed in 1787, established the framework for the new government. The revolution was a testament to the power of the people and the importance of freedom and democracy.

The Civil War, which lasted from 1861 to 1865, was another major event in the history of the United States. It was a war between the Northern states, which were opposed to slavery, and the Southern states, which were in favor of it. The war was fought on many fronts, including the battlefield, the courtroom, and the streets. The Emancipation Proclamation, issued by President Abraham Lincoln in 1863, was a landmark document that declared that all slaves in the Confederate states were free. The war ended in 1865, with the Union victorious and slavery abolished. The Civil War was a defining moment in the history of the United States, and it shaped the country's future in many ways.

The Great Depression, which began in 1929 and lasted until the mid-1940s, was a period of economic hardship and social unrest in the United States. It was a time when many people lost their jobs and their homes, and when the economy was in a state of collapse. The Great Depression was caused by a combination of factors, including a stock market crash in 1929, a drought in the 1930s, and a series of economic policies that led to deflation. The Great Depression was a defining moment in the history of the United States, and it shaped the country's future in many ways.

The United States has a long and rich history, and its story is one of resilience and achievement. It is a story of a nation that has grown from a small colony to a global superpower, and of a people who have fought for freedom and democracy. The history of the United States is a complex and multifaceted story, and it is one that continues to shape the world today.